

VIA ECF

The Honorable Arun Subramanian
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.¹
- Defendants' contract reviewers have reviewed approximately 4,650,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference, including approximately 250,000 documents since Defendants' last update on February 28, 2025.
- Defendants have produced approximately 1,440,000 documents and over 34 billion observations of data covering 7 different countries in this litigation to date, including approximately 40,000 documents since Defendants' last update on February 28, 2025.

Pursuant to the Court's instruction at the March 13, 2025 conference, Defendants further submit the following metric regarding Defendants' ongoing privilege review workflow.

- As of today, there are approximately 55,000 documents in Defendants' privilege review workflow that have been first-level reviewed and not yet produced or logged.

[signatures on following page]

¹ Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: March 14, 2025

Respectfully submitted,

LATHAM & WATKINS LLP



Alfred C. Pfeiffer (admitted *pro hac vice*)
Co-Lead Trial Counsel
Timothy L. O'Mara (admitted *pro hac vice*)
Jennifer L. Giordano
Andrew M. Gass (admitted *pro hac vice*)
Kelly S. Fayne (admitted *pro hac vice*)
Lindsey S. Champlin (admitted *pro hac vice*)
Robin L. Gushman (admitted *pro hac vice*)

505 Montgomery Street, Suite 2000
San Francisco, CA 94111
(415) 391-0600

555 11th Street, NW, Suite 1000
Washington, D.C. 20004
(202) 637-2200

Al.Pfeiffer@lw.com
Tim.O'Mara@lw.com
Jennifer.Giordano@lw.com
Andrew.Gass@lw.com
Kelly.Fayne@lw.com
Lindsey.Champlin@lw.com
Robin.Gushman@lw.com

*Attorneys for Defendants Live Nation
Entertainment, Inc. and Ticketmaster L.L.C.*

cc: All Counsel of Record (via ECF)

CRAVATH, SWAINE & MOORE LLP



David R. Marriott
Co-Lead Trial Counsel
Lauren A. Moskowitz
Jesse M. Weiss
Nicole M. Peles

Two Manhattan West
375 Ninth Avenue
New York, NY 10001
(212) 474-1000

dmarriott@cravath.com
lmoskowitz@cravath.com
jweiss@cravath.com
npeles@cravath.com

*Attorneys for Defendants Live Nation
Entertainment, Inc. and Ticketmaster L.L.C.*